IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

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§	Case No.: 2:24-cv-00325
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§	JURY TRIAL DEMANDED
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JOINT MOTION FOR MODIFICATION OF THE DOCKET CONTROL ORDER FOR GOOD CAUSE

Plaintiff Autoscribe Corporation ("Plaintiff") and Defendants Nuvei Corporation, Nuvei Technologies Corp., and Nuvei Technologies, Inc. (Defendants) respectfully submit this Joint Motion for Modification of Docket Control Order for Good Cause

On October 2, 2024, the Court entered the Agreed Docket Control Order (Dkt. 23), which included the following deadline:

October 9, 2024	*File Proposed Protective Order and Comply with Paragraphs 1 & 3 of the	
	Discovery Order (Initial and Additional Disclosures)	
	The Proposed Protective Order shall be filed as a separate motion with the	
	caption indicating whether or not the proposed order is opposed in any part.	

The Parties request a one-week extension of the deadline to file the proposed protective order, to October 16, 2024.

Good cause exists for the proposed extension. The Parties are negotiating the provisions of the protective order in good faith, and expect that an extension will greatly reduce or eliminate any disputes that would be pending before the Court. Further, the Parties have previously agreed to treat all discovery prior to the issuance of a protective order as "Restricted – Attorneys' Eyes

Only." No Party will be prejudiced by the extension, and neither Party anticipates this extension affecting any other expected deadlines in this case, including the Initial and Additional Disclosures.

Accordingly, and for good cause shown, the Parties respectfully request the Court grant the Parties' motion and extend the deadline to file the proposed protective order.

Dated: October 8, 2024

Respectfully submitted,

/s/ Jason McManis

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Counsel for Defendants Nuvei Corporation, Nuvei Technologies Corp., and Nuvei Technologies, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 8, 2024, a true and correct copy of the above and foregoing document was served upon all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF electronic filing system in accordance with the Federal Rules of Civil Procedure.

/s/ Peter Hillegas
Peter Hillegas

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies pursuant to Local Rule CV-7(h), the Parties met and conferred on October 8, 2024 and that the relief requested in this motion is agreed.

/s/ Peter Hillegas
Peter Hillegas